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Counsel/Parties of Record

MAR 28 2025

Clerk US District Court  
District of Nevada

By: Deputy

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 DREW J. RIBAR,  
4 Plaintiff,

5 v.

6 STATE OF NEVADA ex rel. NEVADA DEPARTMENT OF CORRECTIONS; CARSON  
7 CITY; SHERIFF KENNETH FURLONG, in his official and individual capacities;  
8 DEPUTY JASON BUENO, in his official and individual capacities; DEPUTY SEAN  
9 PALAMAR, in his individual capacity; SGT. ROBERT SMITH, in his individual capacity;  
10 SGT. FERNANDEIS FRAZIER, in his individual capacity; SGT. TJ BOGGAN, in his  
11 official and individual capacities; DISTRICT ATTORNEY JASON WOODBURY, in his  
12 official capacity; and DOES 1–10,  
13 Defendants.

14 Case No. 3:24-cv-00103-ART-CLB

15 **PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

16 [Per Court's February 27, 2025 Order]

17 Plaintiff, DREW J. RIBAR, appearing pro se, respectfully moves this Court for leave to file the  
18 attached First Amended Complaint pursuant to **Federal Rule of Civil Procedure 15(a)(2)** and  
19 the Court's **February 27, 2025 Order Regarding Removal and Leave to Amend**.

20 In support of this Motion, Plaintiff states as follows:

- 21 1. On February 27, 2025, the Court entered an Order granting Plaintiff leave to file an  
22 amended complaint. (ECF No. \_\_, "Order Regarding Removal and Leave to Amend.")
- 23 2. The Court expressly provided Plaintiff the opportunity to "file an amended complaint to  
24 clarify his claims," recognizing that the original pleading was filed in state court and did  
25 not necessarily comply with federal pleading standards.

26  
27 PLEADING TITLE - 1  
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1       3. Plaintiff has now prepared a comprehensive **First Amended Complaint** that complies  
2       with **Federal Rule of Civil Procedure 8(a)** and applicable precedent, including *Ashcroft*  
3       *v. Iqbal*, 556 U.S. 662 (2009), and *Monell v. Department of Social Services*, 436 U.S. 658  
4       (1978).

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6       4. The proposed First Amended Complaint:

- 7             ○ Clarifies the factual allegations and legal bases for all claims;  
8             ○ Adds factual detail supported by properly authenticated exhibits (A through P);  
9             ○ Cures any deficiencies in the original complaint filed in state court;  
10            ○ Reflects new incidents (e.g., March 20, 2025 incident involving Sgt. Boggan) that  
11            occurred after the original filing;  
12            ○ And properly identifies all named defendants and relevant constitutional and  
13            statutory bases for relief.

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15       5. Plaintiff respectfully submits that this amendment is filed in good faith, without undue  
16           delay, and at this early stage of litigation will not prejudice Defendants.

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18       6. Pursuant to Local Rule 15-1(a), a complete copy of the proposed **First Amended**  
19           **Complaint** is attached hereto as Exhibit 1.

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21 WHEREFORE, Plaintiff respectfully requests that the Court enter an order:

- 22  
23           • Granting this Motion for Leave to File First Amended Complaint;  
24           • Directing the Clerk of Court to file the attached proposed First Amended Complaint on  
25           the docket;  
26           • And granting such other and further relief as this Court deems just and proper.

1 Dated: March 28, 2025

2 Respectfully submitted,

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4 /s/ Drew J. Ribar

5 **Drew J. Ribar**

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11 **Plaintiff, Pro Se**

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PLEADING TITLE - 3